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February 8, 2023

Judge Nicholas G. Garaufis
United States District Court
225 Cadman Plaza East
Brooklyn, New York 11201
VIA ECF

RE: United States v. Michael Mancuso
CR No. 05-CR-60
Violation of Supervised Release Hearing
Adjournment Request (Sixth)
Currently Scheduled Date: 2/10/23 at 11:30 a.m.

Your Honor:

The Government and the defense have conferred throughout on this matter. The Government per our exchanges of January 23, 2023 had no objection to this request for an adjournment to February 16, 2023, at 10:00 a.m. As for this request, it is for the personal reasons set out in my letter submitted under seal.


We, the Government and the defense, jointly will then ask for additional time to brief our positions for sentencing. The Government and defense will confer on their submissions as well to hone the discrepancies between our respective positions and to be of most assistance to the Court's review.

There will be a plea to the current supplemental violation as noted by the Government in their letter of December 12, 2022: "Specifically, the defendant intends to plead guilty to the current VOSR Charge One by admitting that he associated with Uvino and Ricciardo, both of whom he knew had prior felony convictions. Such conduct constitutes a violation of Standard Condition No. 9 ('The defendant...shall not associate with any person convicted of a felony, unless granted by permission by the probation officer.'). See Judgement, ECF No. 580." The current position of the Government is that this resolution in itself is not part of any agreement with probation or the Government as the stipulation indicated in their letter is not part of the resolve.

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The request for the delay was entirely due to scheduling for the reasons set forth by this counsel. With apologies for any inconvenience, I remain yours


Most respectfully,
Stacey Richman

cc AUSA Michael Gibaldi, Gibaldi.Michael@usdoj.gov
AUSA Ryan Lehr Ryan_Lehr@nyep.uscourts.gov

and via ECF